

IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ROBERT WILLIAMS

a/k/a Robert 29X

a/k/a Safir S. Allah

CRIMINAL NO. 4:05-cr-00027

J. McClure

INDICTMENT

COUNT ONE

FILED
WILLIAMSPORT, PA

JAN 13 2005

ANTHONY E. D'ANDREA, CLERK
Per Deputy Clerk

THE GRAND JURY CHARGES THAT:

On or about October 26, 2004, at the Rockview State Prison, within the Middle District of Pennsylvania, and elsewhere, the defendant

ROBERT WILLIAMS,

a/k/a Robert 29X,

a/k/a Safir S. Allah,

who was then an inmate, knowingly deposited in a post office or authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to another person in Philadelphia, Pennsylvania, that is, an Assistant United States Attorney, an employee of the United States, containing a threat to injure that person, that is, stating that because that Assistant United States Attorney was involved in the prosecution of "Sister Faridah ali, of Sister Clara Muhammad school," that if the Assistant United States Attorney did not "extricate [him]self from this case," that the Assistant United States Attorney would, among other threats,

be “chastised” by “machine gun fire” and “your car blowing up.”

All in violation of Title 18, United States Code, Section 876.

COUNT II

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 26, 2004, at the Rockview State Prison, within the Middle District of Pennsylvania, and elsewhere, the defendant—

**ROBERT WILLIAMS,
a/k/a Robert 29X,
a/k/a Safir S. Allah,**

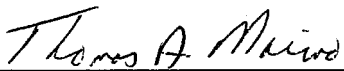
who was then an inmate, did by correspondence knowingly threaten to assault and murder a United States official; namely an Assistant United States Attorney, with the intent to impede, intimidate and interfere with this official while engaged in the performance of his official duties, and with the intent to retaliate against this official on account of the performance of his official duties.

All in violation of Title 18, United States Code, Sections 115(a)(1)(B) and (b)(4).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offenses charged in this indictment defendant **ROBERT WILLIAMS, a/k/a Robert 29X, a/k/a Safir S. Allah:**
 - a. Committed the instant offense while under a criminal justice sentence, that is, imprisonment, as defined by U.S.S.G. § 4A1.1(d).
 - b. Was a career offender, as defined by U.S.S.G. § 4B1.1.
 - c. The threat was made against an employee of United States.


THOMAS A. MARINO *LPS*
United States Attorney
